

**SHEA LARSEN**

1731 Village Center Circle, Suite 150  
Las Vegas, Nevada 89134  
(702) 471-7432

1 Bart K. Larsen, Esq.  
Nevada Bar No. 8538  
2 Kyle M. Wyant, Esq.  
Nevada Bar No. 14652  
3 **SHEA LARSEN**  
1731 Village Center Circle, Suite 150  
4 Las Vegas, Nevada 89134  
Telephone: (702) 471-7432  
5 Fax: (702) 926-9683  
Email: blarsen@shea.law  
6 kwyant@shea.law

7 *Attorneys for HASElect-Medical Receivables*  
8 *Litigation Finance Fund International SP*

9 **UNITED STATES BANKRUPTCY COURT**

10 **DISTRICT OF NEVADA**

11 In re:

12 INFINITY CAPITAL MANAGEMENT, INC.

13 Debtor.

14 HASELECT-MEDICAL RECEIVABLES  
15 LITIGATION FINANCE FUND  
INTERNATIONAL SP,

16 Plaintiff,

17 v.

18 TECUMSEH-INFINITY MEDICAL  
19 RECEIVABLES FUND, LP,

20 Defendant.

21 TECUMSEH-INFINITY MEDICAL  
22 RECEIVABLES FUND, LP,

23 Counter-Plaintiff,

24 v.

25 HASELECT-MEDICAL RECEIVABLES  
26 LITIGATION FINANCE FUND  
INTERNATIONAL SP,

27 Counter-Defendants.  
28

Case No. 21-14486-abl  
Chapter 7

Adversary Case No. 21-01167-abl

**APPENDIX OF EXHIBITS TO  
PLAINTIFF HASELECT-MEDICAL  
RECEIVABLES LITIGATION  
FINANCE FUND INTERNATIONAL  
SP'S OPPOSITION TO TECUMSEH-  
INFINITY MEDICAL RECEIVABLE  
FUND, LP'S MOTION FOR  
PARTIAL SUMMARY JUDGMENT  
AS TO CERTAIN DISPUTED  
RECEIVABLES**

Hearing Date: October 25, 2022  
Hearing Time: 1:30 p.m.

HASELECT-MEDICAL RECEIVABLES  
LITIGATION FINANCE FUND  
INTERNATIONAL SP,  
  
COUNTER-CLAIMANT,  
  
V.  
TECUMSEH-INFINITY MEDICAL  
RECEIVABLES FUND, LP,  
  
COUNTER-DEFENDANT.

PLEASE TAKE NOTICE that Plaintiff HASElect-Medical Receivables Litigation Finance Fund International SP (“HASElect”) hereby lodges the following exhibits, true and correct copies of which are attached hereto:

Exhibit #	Description of Exhibit
Exhibit 1	December 18, 2019 Second Amended & Restated Loan and Security Agreement and Promissory Note
Exhibit 2	February 19, 2019 UCC-1 Filing
Exhibit 3	Excerpts from Transcript of November 10, 2021 Rule 2004 Examination of Oliver Hemmers
Exhibit 4	Excerpts from Transcript of November 9, 2021 Rule 2004 Examination of Anne Pantelas
Exhibit 5	Chicago State Court Complaint
Exhibit 6	Infinity History
Exhibit 7	February 11, 2019 Email re Coastal Notes
Exhibit 8	February 14, 2019 Email re Infinity Loan Obligations
Exhibit 9	February 6, 2018 LFG Notice of Default
Exhibit 10	February 15, 2019 Email re Undisclosed Loans
Exhibit 11	8480 Account Statements
Exhibit 12	December 26, 2019 Draw Request
Exhibit 13	October 29, 2019 re HealthPlus Account Collections
Exhibit 14	Chicago Federal Court Complaint
Exhibit 15	Various Emails re Tecumseh Solicitation of Infinity
Exhibit 16	June 3, 2020 Email re HIPAA Compliance
Exhibit 17	May 25, 2020 Email re Hemmers’ Complaints
Exhibit 18	May 21, 2020 Email with Excerpt of Attached Pitch Deck
Exhibit 19	June 18, 2020 Email with Excerpt of Attached PPM

**SHEA LARSEN**  
1731 Village Center Circle, Suite 150  
Las Vegas, Nevada 89134  
(702) 471-7432

**SHEA LARSEN**  
 1731 Village Center Circle, Suite 150  
 Las Vegas, Nevada 89134  
 (702) 471-7432

Exhibit #	Description of Exhibit
Exhibit 20	July 11, 2020 Email re Three Bell Capital
Exhibit 21	Transcript of October 27, 2021 Meeting of Creditors
Exhibit 22	Operating Account Statements
Exhibit 23	BOA Account Statements
Exhibit 24	August 17, 2021 Email re Open Position Reports with Attached Collections Report
Exhibit 25	Excerpts from Transcript of November 18, 2021 Rule 2004 Examination of Oliver Hemmers
Exhibit 26	Excerpts of Tecumseh's Responses to HASElect's First Set of Requests for Production of Documents
Exhibit 27	Tecumseh's Responses to HASElect's First Set of Interrogatories
Exhibit 28	Stat Diagnostics Contract
Exhibit 29	Stat Diagnostics Payment Example
Exhibit 30	Accounting of Face Value of Stat Diagnostic, Preva, and Viking Receivables
Exhibit 31	Preva Contract
Exhibit 32	Preva Payment Example
Exhibit 33	Viking Contract
Exhibit 34	Viking Payment Example
Exhibit 35	Check Payments to Infinity
Exhibit 36	Check Deposits to BOA Account
Exhibit 37	HealthPlus Contract
Exhibit 39	April 4, 2022 ADV Form
Exhibit 40	January 22, 2021 Email Tecumseh Purchase Order

Dated this 30th day of September 2022.

**SHEA LARSEN**

/s/ Bart K. Larsen, Esq.

BART K. LARSEN, ESQ.

Nevada Bar No. 8538

KYLE M. WYANT, ESQ.

Nevada Bar No. 14652

1731 Village Center Circle, Suite 150

Las Vegas, Nevada 89134

*Attorneys for HASElect-Medical Receivable.  
 Litigation Finance Fund International SP*

**SHEA LARSEN**  
1731 Village Center Circle, Suite 150  
Las Vegas, Nevada 89134  
(702) 471-7432

**CERTIFICATE OF SERVICE**

1  
2 1. On September 30, 2022, I served the following document(s): **APPENDIX OF**  
3 **EXHIBITS TO PLAINTIFF HASELECT-MEDICAL RECEIVABLES**  
4 **LITIGATION FINANCE FUND INTERNATIONAL SP'S OPPOSITION TO**  
5 **TECUMSEH-INFINITY MEDICAL RECEIVABLE FUND, LP'S MOTION**  
6 **FOR PARTIAL SUMMARY JUDGMENT AS TO CERTAIN DISPUTED**  
7 **RECEIVABLES.**

8 2. I served the above document(s) by the following means to the persons as listed  
9 below:

10 ☒ a. ECF System:

11 CLARISSE L. CRISOSTOMO on behalf of ROBERT E. ATKINSON  
12 [clarisse@nv-lawfirm.com](mailto:clarisse@nv-lawfirm.com), [bknotices@nv-lawfirm.com](mailto:bknotices@nv-lawfirm.com)

13 GERALD M GORDON on behalf of TECUMSEH-INFINITY MEDICAL  
14 RECEIVABLES FUND, LP  
15 [ggordon@gtg.legal](mailto:ggordon@gtg.legal), [bknotices@gtg.legal](mailto:bknotices@gtg.legal)

16 GABRIELLE A. HAMM on behalf of TECUMSEH-INFINITY MEDICAL  
17 RECEIVABLES FUND, LP  
18 [gamm@Gtg.legal](mailto:gamm@Gtg.legal), [bknotices@gtg.legal](mailto:bknotices@gtg.legal)

19 MICHAEL D. NAPOLI on behalf of TECUMSEH-INFINITY MEDICAL  
20 RECEIVABLES FUND, LP  
21 [michael.napoli@akerman.com](mailto:michael.napoli@akerman.com),  
22 [cindy.ferguson@akerman.com](mailto:cindy.ferguson@akerman.com); [catherine.kretzschmar@akerman.com](mailto:catherine.kretzschmar@akerman.com); [laura.taveras@akerman.com](mailto:laura.taveras@akerman.com);  
23 [masterdocketlit@akerman.com](mailto:masterdocketlit@akerman.com); [teresa.barrera@akerman.com](mailto:teresa.barrera@akerman.com)

24 ARIEL E. STERN on behalf of TECUMSEH-INFINITY MEDICAL  
25 RECEIVABLES FUND, LP  
26 [ariel.stern@akerman.com](mailto:ariel.stern@akerman.com), [akermanlas@akerman.com](mailto:akermanlas@akerman.com)

27 ☐ b. United States mail, postage fully prepaid:

28 ☐ c. Personal Service:

I personally delivered the document(s) to the persons at these addresses:

☐ For a party represented by an attorney, delivery was made by handing the document(s) at the attorney's office with a clerk or other person in charge, or if no one is in charge by leaving the document(s) in a conspicuous place in the office.

☐ For a party, delivery was made by handling the document(s) to the party or by leaving the document(s) at the person's dwelling house or usual place of abode with someone of suitable age and discretion residing there.

☐ d. By direct email (as opposed to through the ECF System): Based upon the written agreement of the parties to accept service by email or a court order, I caused the document(s) to be sent to the persons at the email addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was

1 unsuccessful.

2 ☐ e. By fax transmission:

3 Based upon the written agreement of the parties to accept service by fax  
4 transmission or a court order, I faxed the document(s) to the persons at the fax  
5 numbers listed below. No error was reported by the fax machine that I used. A copy  
6 of the record of the fax transmission is attached.

7 ☐ f. By messenger:

8 I served the document(s) by placing them in an envelope or package addressed to  
9 the persons at the addresses listed below and providing them to a messenger for  
10 service.

11 I declare under penalty of perjury that the foregoing is true and correct.

12 Dated: September 30, 2022.

13 By: /s/ Bart K. Larsen, Esq.

14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
**SHEA LARSEN**  
1731 Village Center Circle, Suite 150  
Las Vegas, Nevada 89134  
(702) 471-7432